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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10
1200 Sixth Avenue
Seattle, Washington 98101

February 14, 1997

Reply To
Attn Of: HW-113

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Program Management

Nolan R. Jensen, Acting Manager
Environmental Restoration Program
Department of Energy
Idaho Operations Office
850 Energy Drive
Idaho Falls, Idaho 83401-1563

Re: Comments on: March, 1997 Draft Proposed Plan for the Waste Area Group (WAG) 2 Comprehensive Remedial Investigation/Feasibility Study, Operable Unit (OU) 2-13, at the Idaho National Engineering and Environmental Laboratory (INEEL)

Dear Mr. Jensen:

Enclosed are the EPA comments on the subject Draft Proposed Plan. My most significant comments (#7, #11, and #13) all relate to costs for preferred alternatives for sites with marginal risks. If you have any questions, please contact me at 206-553-8633.

Sincerely,

Richard Poeton, WAG 2 Manager

encl

cc: S. Rosenberger, IDHW, 900 N. Skyline, Idaho Falls, ID, 83402, w/encl
D. Nygard, IDHW, 1410 N. Hilton, Boise, ID 83706, w/encl
J. Underwood, IDHW, 1410 N. Hilton, Boise, ID 83706, w/encl
W. Pierre, ECL-113, w/encl

EPA Comments on:

March 1997 Draft Proposed Plan for the Waste Area Group (WAG) 2 Comprehensive Remedial Investigation/Feasibility Study, Operable Unit (OU) 2-13, at the Idaho National Engineering and Environmental Laboratory (INEEL).

Comments:

1. Page 9:

Table 1 would be more useful if it included numerical values where possible (i.e. for human health cancer risk and hazard), rather than yes/no. Using numerical values would address Focus Group comments and would also show the reader which sites had the greatest risk, and which had marginal risks.

2. Page 11:

Under Alternative 2, what is the requirement that says "Active institutional control...is required for a minimum of 100 years following closure."? I recommend deleting that sentence and the one which follows it. Change the last sentence to read "A 100-year institutional control period is assumed to begin in 1998".

3. Page 14:

Risk summaries for all sites should include the maximum risk estimates, rather than just stating "in excess of one chance in 10,000". This would be consistent with some of the Focus Group comments to the effect that the site data to compare against "acceptable limits" should be included. It would also make clear which sites have the largest risks, and which sites have risks that are marginal.

4. Page 17:

DOE Orders are included as ARARs in the list of statutes and in the discussion. DOE Orders are TBCs, and are neither ARARs nor statutes.

5. Page 19, third line from the bottom:

23.3 pCi/g is a PRG, not a "radiation protection goal".

6. Page 20, sidebar:

I recommend the second and third sidebar paragraphs be combined to represent TRA-06 costs as a range, depending on the action needed. Delete the sentence discussing backfilling costs.

7. Page 21:

Costs for the Cold Waste Pond preferred alternative should be expressed as a range, since it is possible that surveys at the time of action would show no sediments above risk-based cleanup goals.

8. Page 21:

I recommend deleting the specific statement that field survey instruments will be the basis for excavation at the Cold Waste Pond. That is a RD/RA issue. It is enough to say that only contaminants exceeding risk-based goals will be excavated.

9. Page 22, first paragraph, last sentence:

Change to read "Hazard Indices for the three sites are all below 1".

10. Page 23, Compliance with ARARs:

A DOE order is addressed as an ARAR. DOE Orders are TBCs.

11. Page 25:

The costs for TRA-15 (\$2,000,000) are not consistent with the preferred alternative (limited action with existing institutional controls). Existing administrative controls through operational facility life (2015), not for 100 years, should be adequate to address the marginal risks to current workers. Residential risks at 100 years are already at 1E-4. I suggest two possible approaches for TRA-15:

(1) Limited Action at little or no cost

It does not appear that costs for TRA-19 and Brass Cap include costs for existing operational controls until actions are taken for these sites at facility closure. If this is the case, costs for existing administrative controls for TRA-15 to closure should likewise be zero. In any event, all three belowgrade sites will remain in place with current controls until facility closure. The difference is that TRA-15 will not be excavated. Costs for TRA-15 should therefore be similar TRA-19 or Brass Cap, less any excavation/disposal costs.

(2) Limited excavation

The risk estimated for this site is based on a single surface (0-6 inches) soil sample taken during the 1993 Track 2 investigation. Samples below that to 10 feet showed little or no contamination. Based on the 624 sq. ft.

surface area for TRA-15, this site could be addressed as a surface excavation with a volume less than that of TRA-19. Costs should be less than those for TRA-19.

12. Page 26, top line:

This sentence should be deleted. The period of unacceptable risks is not 30-100 years. Occupational risks exceed $1E-4$ in the 0-30 year period, but decrease to below $1E-4$ at 30 years.

13. Page 28:

Since the preferred alternative for the Windblown Surficial Soil includes use as backfill for the Sewage Leach Pond, costs for this alternative should be zero since these costs are already included in the costs for the Sewage Leach Pond preferred alternative.